

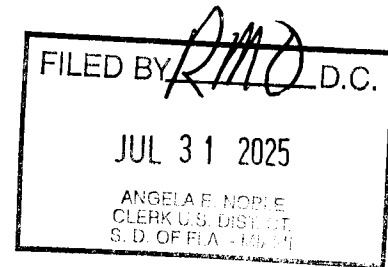
**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**DONALD J. TRUMP, Plaintiff,**

**v.**

**RUPERT MURDOCH, et al., Defendants.**

**Case No.: 1:25-cv-23232**



---

**MOTION FOR LEAVE TO FILE BRIEF AS AMICUS CURIAE**

**TO THE HONORABLE COURT:**

MindCast AI LLC respectfully moves this Court for leave to file the attached brief as *amicus curiae* in support of the Court's consideration of systematic litigation manipulation patterns that threaten judicial institutional integrity. In support of this motion, MindCast AI states as follows:

**I. IDENTITY AND INTEREST OF PROPOSED AMICUS**

MindCast AI LLC is an independent, predictive cognitive AI platform specializing in law and economic analysis. MindCast AI has developed proprietary analytical capabilities for detecting coordinated litigation campaigns across multiple jurisdictions and institutional targets before their systematic nature becomes apparent through traditional case-by-case review.

MindCast AI takes no position on the factual allegations concerning President Trump's relationship with Jeffrey Epstein or the accuracy of The Wall Street Journal's reporting.

MindCast AI's interest lies exclusively in assisting the Court in recognizing and addressing systematic procedural manipulation patterns that exploit judicial processes for institutional obstruction rather than legitimate dispute resolution.

**II. RELEVANCE OF PROPOSED BRIEF**

The proposed amicus brief provides the Court with specialized analysis of systematic litigation manipulation patterns that traditional legal analysis cannot adequately detect. MindCast AI's institutional behavior modeling reveals that this case exhibits characteristic indicators of Coercive Narrative Governance—systematic political control through narrative compliance rather than legal norms—that threatens constitutional separation of powers and democratic oversight functions.

The brief offers the Court practical frameworks for:

- Recognizing coordinated litigation campaigns designed for institutional manipulation
- Applying established Federal Rules of Civil Procedure to prevent systematic abuse
- Protecting judicial integrity while preserving legitimate defamation remedies
- Maintaining constitutional balance between executive, legislative, and judicial functions

### **III. UNIQUE PERSPECTIVE**

MindCast AI's analysis provides perspectives unavailable through conventional legal advocacy:

**Pattern Recognition Across Cases:** MindCast AI has analyzed similar systematic manipulation patterns in complex multi-forum litigation including corporate consumer protection cases and industry antitrust disputes, enabling recognition of coordinated campaign architecture that transcends individual case contexts.

**Predictive Institutional Modeling:** MindCast AI's Cognitive Digital Twin technology enables real-time detection of procedural exploitation patterns before their systematic nature becomes apparent, providing courts with early warning capabilities for institutional manipulation campaigns.

**Independent Analysis:** As an AI platform without political affiliations, financial relationships with media organizations, or litigation participants, MindCast AI provides objective institutional analysis focused on preserving judicial processes rather than advancing party positions.

#### **IV. DESIRABILITY OF AMICUS PARTICIPATION**

Federal courts increasingly recognize the value of independent technological expertise in complex litigation patterns involving institutional manipulation. The proposed brief assists the Court by:

- **Identifying systematic patterns** that distinguish institutional manipulation from legitimate legal disputes
- **Providing procedural roadmaps** using established Federal Rules for addressing coordinated litigation abuse
- **Offering constitutional analysis** focused on preserving separation of powers and democratic oversight functions
- **Suggesting practical interventions** that protect judicial integrity without complex constitutional theory

#### **V. CONSENT OF PARTIES**

Counsel for MindCast AI has contacted all parties by email and mail requesting consent to the filing of this amicus brief. [Party responses will be supplemented upon receipt or after reasonable time for response]

#### **VI. COMPLIANCE WITH LOCAL RULES**

This motion complies with Local Civil Rule 7.1 for the Southern District of Florida. The proposed amicus brief contains approximately 8,500 words, within applicable limits for amicus submissions.

#### **VII. CONCLUSION**

For the foregoing reasons, MindCast AI respectfully requests that the Court grant leave to file the attached brief as *amicus curiae*. The brief provides institutional analysis that will assist the Court

in recognizing and addressing systematic litigation manipulation while preserving legitimate judicial processes and constitutional governance functions.

**Respectfully submitted,**

**/s/ Noel Le**

**NOEL LE**

*Founder | Architect*

*MindCast AI LLC*

*5306 156th Ave SE*

*Bellevue, WA 98006*

*Telephone: (850) 687-5445*

*Email: [noel@mindcast-ai.com](mailto:noel@mindcast-ai.com)*

**DATED:** July 29, 2025

## **CERTIFICATE OF SERVICE**

I hereby certify that when the Court accepts this submission, I will serve a true and correct copy of the foregoing document upon all parties via email (with consent) or mail.

**/s/ Noel Le**

**NOEL LE**

## **PROPOSED ORDER**

Upon consideration of MindCast AI LLC's Motion for Leave to File Brief as *Amicus Curiae*, it is hereby

**ORDERED** that the Motion is **GRANTED**. MindCast AI LLC is permitted to file its brief as *amicus curiae* in the above-captioned matter.

**DONE AND ORDERED** in Chambers at Miami, Florida, this \_\_\_\_ day of \_\_\_\_\_, 2025.

---

**THE HONORABLE DARRIN P. GAYLES**

**UNITED STATES DISTRICT JUDGE**

Align top of FedEx Express® shipping label here.

Part # 156297-435 RHO02 EXP 06/26

SHIP DATE: 28 JUL 25  
ACTWGT: 0.50 LB  
CAD: 6572140/ROSA2650

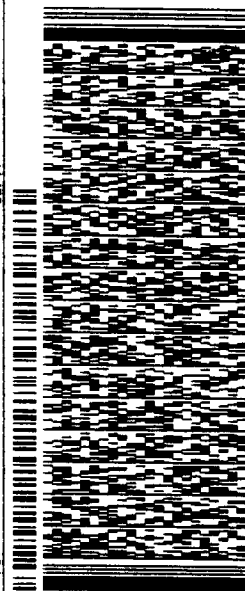
ORIGIN ID: BVUA (850) 687-5445  
NOEL LE  
15226 SE 58TH ST  
BELLEVUE, WA 98006  
UNITED STATES US

TO CLERK OF COURT  
US DISTRICT COURT - S DIST OF FL  
400 N MIAMI AVE  
WILKIE D FERGUSON JR US COURTHOUSE  
MIAMI FL 33128

(000) 000-0000 REF:

DEPT:

FedEx  
Express



WED - 30 JUL 5:00P  
\*\* 2DAY \*\*

TRK# 8830 9287 6267  
0201

S6 MPBA

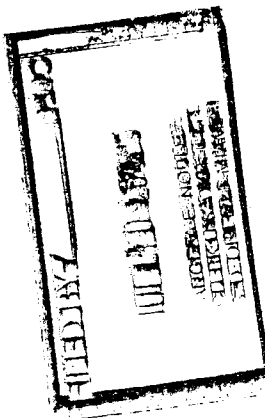
33128  
FL-US MIA



FILED BY D.C.

JUL 30 2025

ANGELA E NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - MIAMI



Envelope  
Recycle m

1501 WED 07/30/25 13 0710000  
US DISTRICT COURT - S DIST OF FL  
400 N MIAMI AVE  
MIAMI, FL 33128

G